one of the Defendants in the above entitled cause, to the Bill of Complaint of John M. Woods, Allen B. Well, George W. Buxton and Eleanor T. Robinson, filed against it and others in the above entitled cause respectfully shows.

That this defendant admits the matters and facts set forth in said Bill of Complaint, and consents to the passage of such decree as may be right and proper in the premises.

And as in duty bound.etc.,

(Filed Sept-10-1917)

Solicitor for the Mar-Ve Development Company, a body corporate of the State of West Virginia.

John M. Woods, Allen B. Woll, George W. Buxton and Eleanor T. Rebinson, Plaintiffs,

VS.

Lookwood C.Rines, Mar-Va
Defelopment Company and
The Interior Marble Quarry,
Defendants.

No. 9675 EQUITY.

In the Circuit Court for

Frederick County,

In Equity.

To the Honorable Judges of said Court!

The answer of the Interior Marble Quarry, a body corporate, to the Bill of Complaint of John M. Woods and others against it and others in this court exhibited.

- 1. This respondent admits the allegations set forth in the first, second, third, fourth, fifth, sixth, seventh, eighth, ninth, tenth and eleventh paragraph of said bill of complaint.
- 2. That this respondent further replying to said bill of complaint says and evers that the said Interior Marble Quarry has not now any creditors or debts outstanding and unpaid that were in existance at the time of the execution of the mortgage deed referred to in said bill of complaint from said Interior Marble Quarry to said J.M.Woods and others, dated December 4th. 1913, and that no creditors then in existance were prejudiced, affected or in any way injured by the execution and lien of said mortgage deed; and that now and at the date of the ecording of said mortgage deed in both Carrell County and Frederick County, in the Syste of Maryland, and thereafter to the filing of said bill of complaintup to the present, the said Interior Marble Quarry has not made did not have, any unpaid and now subsisting creditors or debt, who did not have, or which was not created with the full actual knowledge in fact of the execution, delivery and existance of said mortgage indebtedness, and of said mortgage deed securing the same, of the said Interior Marble Quarry to said J M.Woods and others, as recited in said Bill of complaint, and that no creditor, past or present, of said Interior Marble Quarry can or will be prejudically affected by said mortgage indebtedness and morgage lien.
- 3. That your respondent consents to the immediate passage of a decree as is prayed in said bill of complaint, and will do whatever may be necessary or expedient in the way of further assurances to further perfect the title of the said complainants under the bill.

And as in duty bound, etc.,

(Filed Sept-10-1917)

Solicitors for Respondents.

John M. Woods, et al.

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Lockwood C. Rines, et al.

No. 9675 Equity.

In the Circuit Court for Frederick County, sitting as a Court of Equity.

The Replication of John M. Woods, Allen B. Noll, George W. Buxton and Eleahor L. Robinson, the Plaintiffs in the above entitled cause to the Answer of Lookwood C. Rines, one of the Defendants, in the above entitled cause, that they join issue with the said Defendant, Lookwood C. Rines, on all the matters and things set forth in his answer, in so far as the same may be taken to deny or avoid the allegations of the Bill of Complaint filed in this cause.

Edward J. Smith
Attorney for Plaintiffs.

Filed Nov, 8-1917.

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